# EXHIBIT 3

# Case 1:11-cv-00691-LAK-RWL Document 2187-3 Filed 04/19/19 Page 2 of 15

From: Steven Donziger <sdonziger@donzigerandassociates.com>

Sent: Tuesday, September 5, 2017 6:13 PM

To: Glenn Krevlin <gkrevlin@glenhillcap.com>

Subject: Ecuador -- an invitation

Attach: CanadaDelegation.InfoMemo.docx

Hey there -- Let me know if there is any interest in joining this trip (see attached memo) to the rainforest of Ecuador the last week of September. Will be compelling and life-impacting and you can meet the people I've been working with for several years. Ian Watson, who invested in your round and who is someone you should meet, is coming with his wife Victoria. Also, we are looking for support for the trip if you are interested we can fold it into your investment with 10% premium. No pressure if not interested as Ian seems to want the opportunity. xx

#### Private and Confidential/Do Not Distribute

# Ecuador Trip - Preliminary Itinerary and Key Information

5 September 2017

# **Delegation / North America**

Honored Guests /Leaders: Former National Chief of the Assembly of First Nations, Phil Fontaine; Grand Chief Wilton Littlechild; Grand Chief Edward John

Participants: Attorney John Phillips; Attorney Peter Grant (TBD); Greenpeace Founder and Environmental Leader Rex Wyler; Supporters Ian Watson and Victoria Watson; Artist Lisa Gibbons; Others TBD

# **Delegation Hosts/Ecuador**

Luis Yanza (FDA, or Amazon Defense Coalition), Juan Aulestia (FDA), Others TBD

#### Host: Role of the FDA

The Frente de Defensa de la Amazonia (FDA, or known also as the Amazon Defense Coalition) is the host of the trip. This organization has led the campaign to hold Chevron accountable since its founding by Luis Yanza and others in the early 1990s. The organization is the beneficiary of the legal judgment against Chevron that is being enforced in Canada. Two members of the FDA (Yanza and Pablo Fajardo) are recipients of the prestigious Goldman Environmental Prize. The FDA represents both indigenous and farmer communities who live in the area affected by the Texaco-Chevron oil contamination, which is approximately 1,500 square miles and includes roughly 80 communities.

#### **Contact Information**

Steven Donziger: <a href="mailto:sdonziger@donzigerandassociates.com/917-566-2526">sdonziger@donzigerandassociates.com/917-566-2526</a>

Please note that Laura Miller is helping to organize the trip. Her email is <a href="mailto:lbmiller104@gmail.com">lbmiller104@gmail.com</a>. You might be hearing from Laura directly.

#### **Key Dates**

Sunday, Sept. 24 – Arrive Mariscal Sucre International Airport in Quito, Ecuador. Transfer to Hotel Quito. Try to arrive in time for dinner. Feel free to arrive Saturday to you can adjust to the altitude and get some rest as activity during the trip might be intense.

Monday, Sept. 25 – Early departure via air to Lago Agrio, Ecuador. Visit affected sites and communities in areas with oil and environmental impacts. Meet with representatives of the FDA, the community-based coalition that has led the campaign against Chevron for two decades. Return early evening to Quito.

Tuesday, Sept. 26 – Meetings in Quito with government officials; Confederacion de Nacionalidades de Ecuador (CONAIE), Ecuador's largest indigenous organization that was

founded in 1986; leaders of civil society. Possible press event. Reception with key supporters and Ecuadorian leaders in evening to be followed by private dinner.

Wednesday, Sept. 27 - Depart Mariscal Sucre.

Note: As said, feel free to arrive Saturday; you can also stay a day or two longer if you wish. There is plenty to do in Quito if you have additional time. Let us know and we will extend the hotel reservation and help you plan some interesting activities.

#### Plane reservations

We have found that it is easier if each member of the delegation books his or her own flight to Ecuador. We have budgeted \$1,000 for round-trip airfare and transfers to and from airports on both ends. If you need special dispensation with regard to airfare or any other expense we have not anticipated, please contact Steven. You can either purchase your own ticket and receive reimbursement, or send the reservation to Steven who will arrange for purchase. In any event, please send all flight information so we can keep track of arrival times.

There are no nonstop flights from North America to Quito other than one from New York City on TAME, Ecuador's national airline which we do not recommend. If you want to pass through the U.S., the easiest direct routes generally are through Miami (American Airlines), Houston (United), and Atlanta (Delta). Copa (Panama) and Avianca (Columbia) also have flights that connect through Bogota and Panama City.

# Visas and Passport information

You need a passport to enter Ecuador. Visas generally are not needed for travelers arriving from Canada, the United States, and the United Kingdom.

Please send your passport information (name, nation, and passport number) so we can purchase airline tickets for the flights within Ecuador.

#### **Immunizations**

Please check with your doctor. Generally, not needed for a one-day trip to the rainforest.

#### Clothes

Quito sits at roughly 9,000 feet. Temperatures can become cool at night so bring a jacket or sweater. There is a lovely heated pool at the Hotel Quito so bring a bathing suit if you like to swim. The weather is usually comfortable during the day.

In the rainforest, bring light clothes, a hat, suntan lotion, and insect repellant. Hiking boots or running shoes will suffice. Travel will be in comfortable vehicles. We will not be hiking or walking long distances.

# **Transfers from Airport to Hotel Quito**

Because people are arriving at different times, please take a taxi from the airport to the hotel. There is a taxi line outside baggage claim. Fare to the Hotel Quito is approximately \$30 and the ride takes between 30 minutes and one hour, depending on traffic.

#### Hotel

The Hotel Quito is an Art Deco-style building constructed in the 1960s that sits on a high ridge overlooking the city. The views are spectacular. The rooms are modest and comfortable.

#### Meals

All meals will be provided. Breakfast each morning will be in the Hotel Quito at the buffet.

#### **Time**

Note that Quito is one hour behind EST (New York and Toronto) and two hours ahead of PST (Vancouver).

# **Briefing Book/Background**

A briefing book with a detailed itinerary, contact info, biographies, key information, and articles will be provided to each participant prior to departure. Luis Yanza and Steven Donziger will provide a briefing upon arrival and various briefings will take place throughout the trip.

# **Biographies**

Please send a biography or any relevant background information that you wish to be included in the briefing book.

#### **Background Reading/Media**

Further general background, videos and materials related to the case can be found at www.chevrontoxico.com and in numerous media articles, including:

Chevron Says These People Don't Matter - Huffington Post

A legal brief that contains a comprehensive history of the case on pp. 5-67.

60 Minutes segment, 2009:

http://www.metacafe.com/watch/11468768/amazon-crude-on-60-minutes

Vanity Fair: http://www.vanityfair.com/news/2007/05/texaco200705

New York Times on Canada enforcement action:

http://www.nytimes.com/2015/09/05/business/international/court-says-chevron-can-be-

# pursued-in-canada-over-ecuadorean-damage.html

Chevron Faces Major Difficulties in Canada: <a href="http://www.csrwire.com/press\_releases/38268-Chevron-Facing-Major-New-Difficulties-In-Ecuador-Pollution-Case-After-Losing-Before-Canada-Supreme-Court">http://www.csrwire.com/press\_releases/38268-Chevron-Facing-Major-New-Difficulties-In-Ecuador-Pollution-Case-After-Losing-Before-Canada-Supreme-Court</a>

##

INQUIRIES:

Steven Donziger, Esq. sdonziger@donzigerandassociates.com +1-917-566-2526

# Case 1:11-cv-00691-LAK-RWL Document 2187-3 Filed 04/19/19 Page 7 of 15

From: Karen Hinton <karen@fenton.com>
Sent: Tuesday, September 26, 2017 11:40 PM

To: crisamunoz@gmail.com

Cc: Laura Miller <a href="mailto:lbmiller104@gmail.com">" Peter Grant <a href="mailto:pgrant@grantnativelaw.com">" pgrant@grantnativelaw.com">" pgrant@grantnativ

Howard Glaser <hglaser 1@gmail.com>; Steven Donziger

<sdonziger@donzigerandassociates.com>; Victoria Watson <victoriawatson@me.com>;
Ian Watson <iw@genagro.net>; agustin.salazar@salazarcordova.com; John Phillips

<john.phillips@legaladvocates.ca>; edjohn@fns.bc.ca; Luis Yanza

<lfya62@gmail.com>; Ifontaine 
Ifontaine@ishkonigan.com>; Rex Weyler

<rexweyler1@gmail.com>; Ma Guadalupe De Heredia <up>lupitadeheredia@gmail.com>;

Lisa Gibbons <a href="mailto:siaweylergibbons@gmail.com">siaweylergibbons@gmail.com</a>; Patricio Salazar Cordova

<patriciosalazarcordova@gmail.com>; Aaron Marr Page <aaron@forumnobis.org>;

Katie Sullivan < Katie@Streamlinefamilyoffice.com>

**Subject:** Re: CBC interview

Thanks sooo much!

#### **Karen Hinton**

Chief Strategy Officer

**FENTON** 

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New York, NY 10036

212.584.5000 office 703.798.3109 mobile

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NY / DC / SF / LA / fenton.com

On Sep 26, 2017, at 10:16 PM, cristina muñoz <crisamunoz@gmail.com> wrote:

Hello Karen, this is some BRoll for the media to use.

Source: FDA
Date: sept 25th

Place: Shushufindi, Nueva Loja and San Carlos.

https://we.tl/LpcBaXDzuB

Bests,

El 26 sept. 2017 3:11 PM, "Karen Hinton" < karen@fenton.com > escribió:

Brandi Morin with CBC wants to interview today Ed John, Phil Fontaine, Rex Weyler and an Ecuadorian attorney about the visit to Ecuador. Steven, you also can call her. Her phone number to call is 780-700-7063.

Let me know when you can call, so she knows the call is coming. I know you have a government meeting at 4:30 today so would be good to call her before that if possible. I also am sending her photos from yesterday. If anyone wants to send me additional photos, I can send those, too. I talked about the press conference today and what was discussed. Thanks! Karen Karen Hinton **Chief Strategy Officer FENTON** Strategies and Campaigns to Change our World 630 Ninth Ave Suite 910 New York, NY 10036 212.584.5000 office 703.798.3109 mobile

Follow Me On Twitter

Case 1.11-cv-00091-LAK-RWL Document 2187-3 Filed 04/19/19 Page 9 01 15
@KarenHinton
NY/DC/SF/LA/ fenton.com
From: Steven Donziger <sdonziger@donzigerandassociates.com> Date: Tuesday, September 26, 2017 at 12:50 AM To: Ifontaine <!--fontaine@ishkonigan.com-->, "edjohn@fns.bc.ca" <edjohn@fns.bc.ca>, John Phillips <john.phillips@legaladvocates.ca>, Peter Grant <pgrant@grantnativelaw.com>, lan Watson <iw@genagro.net>, Victoria Watson <victoriawatson@me.com>, Rex Weyler <rexweyler1@gmail.com>, Lisa Gibbons &lt; iisaweylergibbons@gmail.com&gt;, Katie Sullivan <katie@streamlinefamilyoffice.com>, "lbmiller104@gmail.com" <lbmiller104@gmail.com>, Luis Yanza <!--fya62@gmail.com-->, "aaron@forumnobis.org" <aaron@forumnobis.org>, Karen Hinton <karen@fenton.com>, Howard Glaser <hglaser1@gmail.com> Cc: "juanaulestia01@gmail.com" <juanaulestia01@gmail.com>, "lupitadeheredia@gmail.com" <lupitadeheredia@gmail.com>, cristina muñoz <crisamunoz@gmail.com>, "agustin.salazar@salazarcordova@gmail.com&gt;, "agustin.salazar@salazarcordova.com&gt; Subject: Delegation Schedule for Tuesday</crisamunoz@gmail.com></lupitadeheredia@gmail.com></juanaulestia01@gmail.com></hglaser1@gmail.com></karen@fenton.com></aaron@forumnobis.org></lbmiller104@gmail.com></katie@streamlinefamilyoffice.com></rexweyler1@gmail.com></victoriawatson@me.com></iw@genagro.net></pgrant@grantnativelaw.com></john.phillips@legaladvocates.ca></edjohn@fns.bc.ca></sdonziger@donzigerandassociates.com>
Here is our Tuesday schedule:
EAT BREAKFAST AT YOUR LEISURE IN THE UPSTAIRS DINING ROOM.
8 a.m Press conference participants convene at breakfast in the upstairs dining room.
9:20 a.m Everybody meets in lobby to depart for press conference.
10 a.m Press conference

11 a.m. -- Depart press conference for strategy meeting at Hotel Quito.

# Case 1:11-cv-00691-LAK-RWL Document 2187-3 Filed 04/19/19 Page 10 of 15

12:30: LUNCH. COULD BE AT HOTEL OR NEARBY.

2:15 p.m. -- Meet in lobby to depart for private tour of Guayasamin art museum. Oswaldo Guayasamin was one of the leading artists in Latin America and his work is coveted throughout the world. You do not want to miss this.

4:30 -- Depart hotel for Foreign Ministry for meeting with high-level officials. (This will be a core group that includes Phil, Ed, John, Peter, Luis, Steven with translators.)

7:30 p.m. -- Meet in lobby for transport to our closing dinner with special invited guests.

If you have any questions, I will be up in the dining room starting around 8 a.m. Tuesday.

Thanks much, Steven

# Case 1:11-cv-00691-LAK-RWL Document 2187-3 Filed 04/19/19 Page 11 of 15

From: Steven Donziger <sdonziger@donzigerandassociates.com>

Sent: Thursday, September 28, 2017 1:47 AM

To: Ifontaine < Ifontaine@ishkonigan.com>; edjohn@fns.bc.ca; Rex Weyler

<rexweyler1@gmail.com>; John Phillips <john@waddellphillips.ca>; Peter Grant
<pgrant@grantnativelaw.com>; Ian Watson <iw@genagro.net>; Victoria Watson
<victoriawatson@me.com>; Lisa Gibbons lisaweylergibbons@gmail.com>; Katie
Sullivan <Katie@Streamlinefamilyoffice.com>; Karen Hinton <karen@fenton.com>;
Howard Glaser <hglaser1@gmail.com>; lbmiller104@gmail.com; Aaron Marr Page

<aaron@forumnobis.org>; Luis Yanza <lfya62@gmail.com>

Cc: juanaulestia01@gmail.com; cristina muñoz <crisamunoz@gmail.com>

**Subject:** Ecuador delegation -- Thank you

# To everybody,

On behalf of the FDA and the affected communities in Ecuador's Amazon, I want to extend my heartfelt thanks to each of you for taking the time to come to the rainforest to observe the environmental damage and to listen to the stories of the local population.

The presence of each of you in the "Amazon Chernobyl" area of Ecuador was profoundly felt. It sent a powerful message to the local communities that they are not alone, and that their situation matters to thoughtful and caring people who have the capacity to do something meaningful on their behalf. For me personally, it was an extraordinary and historic experience. The arrival of our Canadian brothers and sisters set in motion alliances among peoples in Ecuador that we have not seen in the 24-year history of the campaign. We believe these alliances create a solid foundation for accelerated progress in the coming months.

I want to single out National Chief Phil Fontaine and Grand Chief Ed John for going "all in" on the trip. Your insight, commitment, and personal warmth resonated greatly. I also want to thank Ian Watson and Victoria Watson for their presence and support which has helped bring us all together and to make the campaign against Chevron possible.

I will keep this group updated periodically on our progress on the Canada litigation and follow-up plans. I also am going to add each of you to our distribution list so you can get materials.

Love to you all,

Steven

# Case 1:11-cv-00691-LAK-RWL Document 2187-3 Filed 04/19/19 Page 12 of 15

From: Karen Hinton < karen@fenton.com>
Sent: Friday, September 29, 2017 8:15 AM

To: crisamunoz@gmail.com

Cc: Steven Donziger <sdonziger@donzigerandassociates.com>; lfontaine

Ifontaine@ishkonigan.com>; Penny Jacko <pjacko@ishkonigan.com>;
edjohn@fns.bc.ca; John Phillips <john@waddellphillips.ca>; Peter Grant

<pgrant@grantnativelaw.com>; Ian Watson <iw@genagro.net>; Victoria Watson
<victoriawatson@me.com>; Howard Glaser <hglaser1@gmail.com>; Katie Sullivan

<Katie@streamlinefamilyoffice.com>; juanaulestia01@gmail.com;

aaron@forumnobis.org; Rex Weyler <rexweyler1@gmail.com>; Lisa Gibbons

lisaweylergibbons@gmail.com>; lbmiller104@gmail.com

**Subject:** Re: CBC story

Wow! Tks! So many ....

#### **Karen Hinton**

Chief Strategy Officer

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On Sep 29, 2017, at 8:01 AM, cristina muñoz < crisamunoz@gmail.com > wrote:

Thank you, Karen.

These are some stories published related to the visit.

Bests.

Hispan TV / Irán

https://youtu.be/RPvkrcoRfYM

AFP / Francia

http://www.gettyimages.es/license/854269364

TELESUR Inglés / Venezuela

https://www.telesurtv.net/english/news/Indigenous-Groups-From-Canada-Join-Ecuadors-Fight-Against-Chevron-20170926-0005.h

tml

El Comercio Tv / Televicentro / Ecuador https://youtu.be/DgOeOmqNOV0

Radio Temblor / Centro América

https://mx.ivoox.com/es/indigenas-fortalecen-lucha-contra-chevron-ecuador-audios-mp3\_rf\_21162715\_1.html

METRO ECUADOR / Ecuador

# Case 1:11-cv-00691-LAK-RWL Document 2187-3 Filed 04/19/19 Page 13 of 15

https://www.metroecuador.com.ec/ec/noticias/2017/09/25/lideres-indigenas-canadienses-ecuatorianos-visitan-zona-contaminada-petrolera-chevron.html

MEDIOS PÚBLICOS / Ecuador

http://www.mediospublicos.ec/noticias/actualidad/indigenas-canadienses-visitaron-zonas-afectadas-por-chevron-en-el-ecuador

CONTACTO HOY / Ecuador

https://contactohov.com.mx/lideres-indigenas-canadienses-visitan-zona-contaminada-por-petrolera-chevron/

NOTICIAS YAHOO / EEUU

https://es.noticias.yahoo.com/unos-1%C3%ADderes-ind%C3%ADgenas-canad%C3%A1-visitan-el-desastre-ambiental-105653734.html

AGENCIA EFE / España

https://www.efe.com/efe/america/sociedad/lideres-indigenas-canadienses-visitan-una-zona-contaminada-por-la-petrolera-chevron-en-amazonia-ecuatoriana/20000013-3390077

ECUADORINMEDIATO / Ecuador

http://mobile.ecuadorinmediato.com/index.php?module=Noticias&func=wap\_news\_view&id=2818826382

AGENCIA ANDES / Ecuador

http://www.andes.info.ec/es/noticias/indigenas-canadienses-visitaron-desastre-ambiental-atribuido-chevron-amazonia-ecuatoriana

TELESUR Español / Venezuela

https://www.telesurtv.net/news/Indigenas-de-Canada-apoyan-a-afectados-por-Chevron-en-Ecuador-20170926-0061.html

DIARIO EL TELEGRAFO / Ecuador

http://www.eltelegrafo.com.ec/noticias/politica/2/indigenas-canadienses-visitan-zonas-donde-opero-chevron

DIARIO LA HORA / Ecuador

https://lahora.com.ec/esmeraldas/noticia/1102102711/abogado-de-afectados-por-chevron-cree-en-2-o-3-anos-concluira-caso-a-su-favor

SPUTNIK / Alemania

https://mundo.sputniknews.com/americalatina/201709271072676594-ecuador-indigenas-petrolera/

EL PAIS / Costa Rica

http://www.elpais.cr/2017/09/26/indigenas-de-canada-apoyan-reclamo-de-ecuatorianos-afectados-por-multinacional-chevron/

@crisamunoz

On Wed, Sep 27, 2017 at 5:58 PM, Karen Hinton <a href="mailto:karen@fenton.com">karen@fenton.com</a> wrote:

This turned out nicely. Take a look:

Thank you again for all your help!

http://www.cbc.ca/beta/news/indigenous/indigenous-ecuador-pollution-1.4310228

**Karen Hinton** 

Chief Strategy Officer

**FENTON** 

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On Sep 24, 2017, at 1:40 PM, Steven Donziger <sdonziger@donzigerandassociates.com > wrote:

Friends,

Please see attached. You will also get a hard copy today in the briefing book when we meet at 5 p.m. in the lobby of the Hotel Quito, or in Phil's case, when he arrives tonight.

I would recommend perusing this as soon as you can to get familiar with those on the delegation.

Thanks, Steven

<Canada.Delegation.Bios.Long.docx>

# Case 1:11-cv-00691-LAK-RWL Document 2187-3 Filed 04/19/19 Page 15 of 15

From: Steven Donziger <sdonziger@donzigerandassociates.com>

Sent: Wednesday, September 27, 2017 8:28 PM

To: Karen Hinton < karen@fenton.com>

Cc: Ifontaine <a href="fishkonigan.com">fontaine <a href="fishkonigan.com">fontaine <a href="fishkonigan.com">fishkonigan.com</a>; Penny Jacko <a href="fishkonigan.com">pjacko <a href="fishkonigan.com">fishkonigan.com</a>; Penny Jacko <a href="fishkonigan.com">fishkonigan.com</a>;

edjohn@fns.bc.ca; John Phillips <john@waddellphillips.ca>; Peter Grant <pgrant@grantnativelaw.com>; Ian Watson <iw@genagro.net>; Victoria Watson <victoriawatson@me.com>; Howard Glaser <hglaser1@gmail.com>; Katie Sullivan

<Katie@Streamlinefamilyoffice.com>; juanaulestia01@gmail.com; aaron@forumnobis.org; Rex

Weyler <rexweyler1@gmail.com>; Lisa Gibbons saweylergibbons@gmail.com>;

lbmiller104@gmail.com; cristina muñoz <crisamunoz@gmail.com>

Subject: Re: CBC story

Thank you Karen for making this happen.

From: Karen Hinton <karen@fenton.com>

Sent: Wednesday, September 27, 2017 6:58:58 PM

To: Steven Donziger

Cc: Ifontaine; Penny Jacko; edjohn@fns.bc.ca; John Phillips; Peter Grant; Ian Watson; Victoria Watson; Howard Glaser; Katie Sullivan; juanaulestia01@gmail.com; aaron@forumnobis.org; Rex Weyler; Lisa Gibbons; Ibmiller104@gmail.com; cristina muñoz

Subject: CBC story

This turned out nicely. Take a look: Thank you again for all your help!

http://www.cbc.ca/beta/news/indigenous/indigenous-ecuador-pollution-1.4310228

#### Karen Hinton

Chief Strategy Officer

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